

Exhibit O

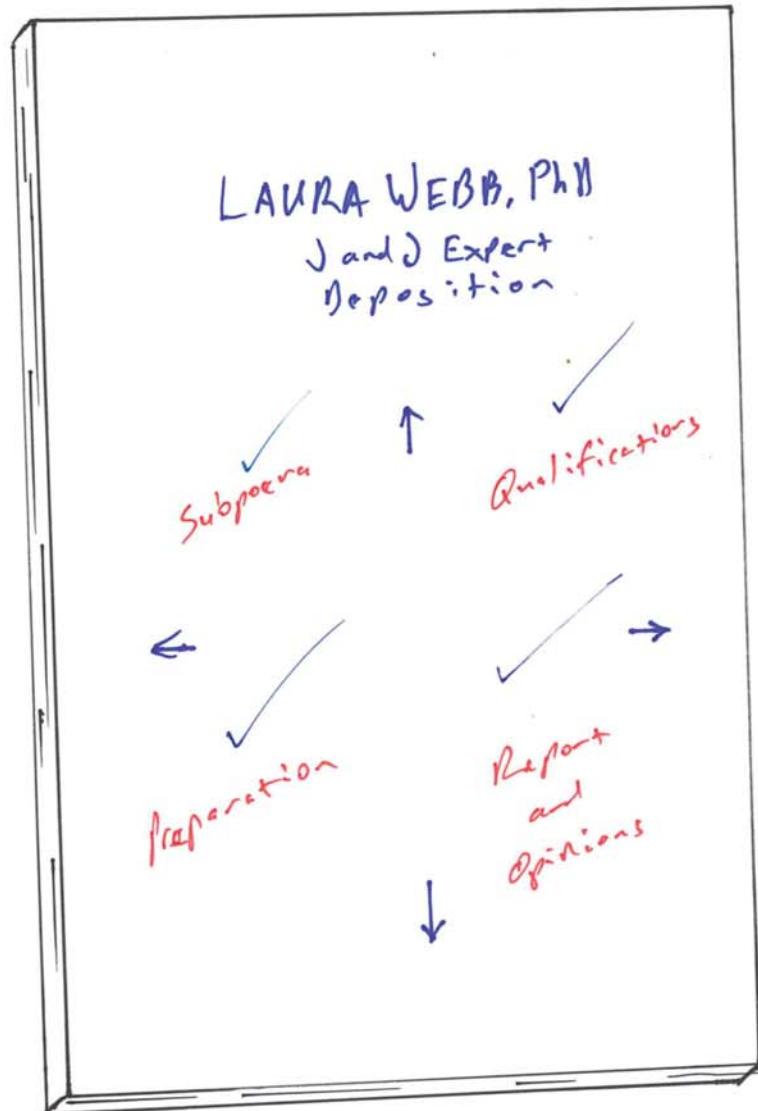
Dr. Laura Webb: Activities Supporting Opinions

ACTIVITY	(YES)	(NO)
Ever work in a talc mine?		X
Ever design any talc mine operations?		X
Ever consult on any talc mine operations?		X
Ever design any drill core sampling protocols for any talc mines?		X
Ever design a blast hole sampling protocol for any talc mine?		X
Ever design an open pit mining operation?		X
Ever design an underground mining operation?		X
Ever supervise or consult on the ongoing operation of a mine?		X
Ever visit any J&J talc mines?		X
Ever conduct any field observations at any talc mines?		X
Ever conduct any field observations at any J&J talc mines?		X
Ever inspect any talc mines?		X
Ever inspect any J&J talc mines?		X
Ever review petrographic maps from J&J talc mines?		
Ever review any geologic maps from a talc mine?	X	
Ever review any geologic maps from J&J talc mines?		X
Ever review any mine planning maps from a talc mine?		X
Ever seen the drill cores taken from a talc mine?		X
Ever seen the drill cores taken from J&J talc mines?		X
Ever review any mine planning maps from J&J talc mines?		X
Ever analyze any thin sections from cores removed from a talc mine?		X
Ever analyze any thin sections from cores removed from J&J talc mines?		X
Ever seen the results of an analysis of thin sections from cores removed from a talc mine?		X
Ever seen the results of an analysis of any thin sections from cores removed from J&J talc mines?		X



PLAINTIFF DEMONSTRATIVE 2

Ever inspect any core logs from a talc mine?	X
Ever inspect any core logs from J&J talc mines?	X
Ever Ask for any samples of J&J talc?	X
Ever taken any samples or rock specimens from a talc mine?	X
Ever taken any samples or rock specimens from J&J talc mines?	X
Ever conduct XRD on any J&J talc?	X
Ever conduct PLM on any J&J talc?	X
Ever conduct SEM on any talc?	X
Ever conduct SEM on any J&J talc?	X
Ever conduct TEM on any talc?	X
Ever conduct TEM on any J&J talc?	X
Ever seen test results from samples taken from J&J talc mines?	X
Ever designed or supervised a beneficiation process for talc ore?	X
Ever publish on talc deposits used to source J&J Talc in Italy, Vermont or China?	X
Ever publish on asbestiform amphiboles and talc?	X
Ever publish on asbestiform serpentines (chrysotile) and talc?	X
Ever publish on methodological approaches to differentiate asbestiform amphibole and non-amphibole minerals in talc?	X
Ever identify any asbestiform amphiboles in talc?	X



Plaintiff Dem.

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Exhibit P

Date	Exhibit #	Testing Entity	Author	Recipients	Purpose Stated	Test method	Mine	What was tested	Special Preparation	What tests revealed	Hopkins' Comments	Satisfies J&J Asbestos Defn
10/15/1957	J&J-309	Battelle	Smith					Italian talc		"the Italian talc averages about 10% fibrous or acicular particles"		
5/9/1958	J&J-1	Battelle	Smith	Dr. Lycan		petrograph	Val Chisone	processed talc; Italian		tremolite; tremolite; 6 to 10 % fibrous talc		
5/23/1958	J&J-2	Battelle	Smith	Dr. Lycan		microscope	Val Chisone	1				
12/4/1970	J&J-9	Colorado School of Mines	Miller			XRD & petrograph	Hammondsville	38 core samples		tremolite-actinolite, fibrous talc		
3/9/1971	J&J-257	McCrone	Griege	Goudie								
5/14/1971	J&J-255	J&J	Ashton	Smith		XRD		Baby Powder (production batch)		tremolite, tremolite-actinolite		
7/2/1971	J&J-256	Colorado School of Mines	Pattengill	Ashton		XRD, PLM				5 of 6 show tremolite-actinolite, "no other forms of non-talc minerals approaching asbestos types were identified"		
7/7/1971	J&J-15	Colorado School of Mines	Pattengill	Ashton		XRD	Vermont talc	processed talc-344-L		tremolite & actinolite		
7/23/1971	J&J-19	Colorado School of Mines, McCrone, Dartmouth	Nashed	Foster						"trace amounts of fibrous minerals; (tremolite/actinolite)"		
10/12/1971	J&J-23	McCrone	Griege	Goudie	appearance and fiber content	electron diffraction	Shower to Shower			traces of chrysotile in one of additives		
11/11/1971	J&J-376	McCrone	Griege	Goudie						"The Shower to Shower appeared to have a few more fibers than the other two samples, however I think that might be due to possible contamination from the G-11. In the G-11 we did find two positively identified chrysotile fibers and some other fibers which at first glance appeared to be chrysotile, when you look at the electron diffraction pattern, I believe that most of the fibers in Shower to Shower which are suspected may come from G-11... I left out the comments on G-11 from the report because I felt you might want to change your supplier or investigate your supplier, and this would only tend to confuse the issue perhaps with the FDA."		



8/3/1972 J&J-28	NYU	Seymour Lewin	Dr. Weissler (FDA)	XRD	Shower to Shower sample 84	5% chrysotile; About 1 fiber or rod/needle every 500 particles.	YES
8/10/1972 J&J-373	J&J			PLM	Shower to Shower	Approx 1/3 of these are tremolite...	
8/24/1972 J&J-29	Sperry Rand	Nashed	Dr. R. A. Fuller	FDA submits Lewin sample	SEM		
8/31/1972 J&J-348	Sperry Rand	J. Wehrung		SEM	Shower to Shower	"asbestos fibers could be detected in the sample"; "reported chrysotile"	YES
9/8/1972 D-7	Sperry Rand	J.J. Wehrung		SEM	Shower to Shower	Dr. Weissler used SEM "to study general shape of chrysotile asbestos. " "Dr. Weissler he did find fibers which had the general shape of chrysotile". Also found "asbestos form fibers" in samples brought by J.J. which were photographed."	
9/26/1972 J&J-31	Dr. Lewin	Dr. Nashed	Dr. Fuller			Observation of asbestosform "more correctly be called fiberform" SEM "very able to identify fiberforms which may be chrysotile"	
10/27/1972 J&J-36-34-37	McCrone	Stewart	Goudie	XRD; TEM	Shower to Shower	Medicated Powder; tremolite 4% Baby Powder; 1.6% Baby Powder; 2-3% chrysotile Shower to Shower; 2.5% chrysotile	YES
2/26/1973 J&J-100	Colorado School of Mines	Reid	Ashton	"the presence of asbestosform minerals" mineralogy & occurrence of any asbestos type minerals	XRD	"Both samples contained an insignificant amount of tremolite;" tremolite rods	
4/26/1973 J&J-44	J&J	Petterson	Johnston	PLM	Hammondsville Powder	tremolite-actinolite; slight trace of anthophyllite? Chrysotile? asbestos type materials"	YES
4/27/1973 J&J-335	J&J			optical microscope	processed talc	"tremolite or actinolite are identifiable (optical microscope) and these might be classified as asbestos fiber" trace amounts of amphiboles in all samples. The optical properties of the particles are closer to actinolite than tremolite"	NO
5/1/1973 J&J-367		Miller	Petterson		Hammondsville ore	"the ore body contains tremolite"	
						Doesn't say which mine	
5/8/1973 J&J-368	J&J	Petterson			Hammondsville ore	"Your question this morning was how old Lewin assay timing relate to actinolite showings. Baby Powder lots 108T & 109T were alleged to contain asbestos forms by Lewin. Talc shipments checked by microscope have showed all lots clean just prior to and right after that time. the first showing of actinolite we know about is October 1972. The indications are that things were in good shape when Lewin picked up the above two lots for his assays."	
6/6/1973 J&J-47	Cardiff	Pooley	Ashton		our Vermont talc	concentration technique	
9/6/1973 J&J-258	FDA	Stuart		XRD; PLM	Shower to Shower sample 84	fibers of tremolite/actinolite"	YES
12/21/1973 J&J-263	Colorado School of Mines	Reid	Ashton	"examined for chrysotile and/or tremolite"	Vermon talc samples centrifuge	"identified chrysotile at a level of less than 10 ppm in the Vermont sample"	YES

Exhibit Q

R.J.Kerstetter

MAR 25 1992

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CYPRUS ORE RESERVES - ARSENIC & TREMOLITE

Excerpts from Cyprus Talc Reserve Report by R.C. Munro

Geology & Environment

There are some important environmental issues related to the geology and mineralogy of the Cyprus talc deposits, particularly in Vermont.

Arsenic

Arsenic iron sulphides (arsenopyrite) are, with their alteration products, present in many of the talc-carbonate schist ore zones in the Vermont area. Total arsenic, as analyzed in the Ludlow Rainbow deposit, averages generally less than 100 ppm but with some small zones in excess of 1000 ppm. No apparent major effort is underway to regularly monitor or completely assess the total arsenic content of ores, tailing solids and wastes although the distribution of sulphides and arsenates in the talc ore system is generally understood.

In near surface weathering zones, crushed rock, stock piles and mine working areas, the arsenic sulphides (above) convert in part to the more soluble arsenates, for example, the hydrous nickel arsenate, annabergite (38% AS_2O_5). Soluble arsenic is measured in cores, ore samples, mill feed, product and tailings. Soluble arsenic content is monitored and governed under EPA/OSHA regulations.

High (e.g. +6 ppm As) soluble arsenic contents of mill feed at the West Windsor mill contribute to reduced recoveries and milling rates. At West Windsor, part of the mill recovery problem at least is being ascribed to a high fines content in the feed and to low pH of the process water, both of which contribute to increased soluble As. The problem has been under study at West Windsor since 1987 by Mill Manager, Jeff Scott, who indicated that if the arsenic content is above +6 ppm soluble As and the talc content falls below 62% talc production rates and recoveries can fall by 50%. The product specs are -3 ppm As or less at West Windsor and current material in the silos is measured at 0.73 ppm to 2.33 ppm soluble As.



for burial, have been measured at 0.33% to 0.70% tremolite by Three Forks and Alpine Mill Labs.

No fibrous material showed up in samples taken by the writer at the Western Source Red Hill mine in California, but minor tremolite is possibly present in the contact zone where it should be avoidable by selective mining.

Arsenic content (total and soluble) and the presence of fibrous minerals in exposed stockpiles and waste need to be checked at Alpine, Alabama and the now closed California properties operated by Cyprus in the past.

Renn

/eji

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